

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

**JOINT MOTION FOR ENTRY OF ORDER REGARDING ELECTRONICALLY
STORED INFORMATION (“ESI”)**

1. The parties, through their undersigned counsel, hereby respectfully move for the entry of an order regarding discovery procedure, specifically pertaining to the handling of electronically stored information (“ESI”). The grounds for this joint motion are as follows:

2. Plaintiffs United States, the Commonwealth of Virginia, and the States of California, Colorado, Connecticut, New Jersey, New York, Rhode Island, and Tennessee (“Plaintiffs”) initiated this action on January 24, 2023, against defendant Google LLC, alleging violations of the antitrust laws. ECF 1. The States of Arizona, Illinois, Michigan, Minnesota, Nebraska, New Hampshire, North Carolina, Washington, and West Virginia joined the action as Plaintiffs on April 17, 2023. ECF 120.

3. As part of the discovery process, the parties anticipate exchanging significant productions of ESI.

4. In order to facilitate the efficient and expeditious exchange of ESI during the discovery process, the parties respectfully request that this Court enter the attached proposed order, which sets forth agreed-upon procedures that shall be followed with respect to the handling of ESI.

Dated: April 19, 2023

Respectfully submitted,

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